

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

United States of America,

v.

Russell Lucius Laffitte,
Defendant.

Case No. 9:22-cr-00658-RMG

SPECIAL VOIR DIRE

In compliance with Judge Gergel's Special Instructions, Defendant submits the following special voir dire questions:

1. Have you listened to any podcast about the Murdaugh family or Russell Laffitte — including, but not limited to, the Murdaugh Murders Podcast or Murdaugh Family Murders podcast?
2. Have you read any news or online article about the Murdaughs or Russell Laffitte from FITSNews, the Post and Courier, the State Newspaper/media outlets, the Beaufort Gazette, the Aiken Standard, the Island Packet, or any other source?
3. Have you watched any video or television special about the Murdaughs or Russell Laffitte?
4. Have you ever posted on social media, liked, commented on, or shared any article or post about the Murdaughs or Russell Laffitte?
5. Have you or any close friends or relatives collected money in a personal injury or wrongful death settlement?
6. Have you or any close friends or relatives lost a significant amount of money where you believe the loss was caused by someone else's wrongdoing, dishonesty, or fraud?

Certification: I have examined the court's standard juror questionnaires and believe the proposed special voir dire does not duplicate these questionnaires or the court's standard inquiries as set forth in Judge Gergel's Special Instructions. I believe the following questions are reasonably necessary for selection of an impartial jury.

[Signature on following page.]

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By: /s/ E. Bart Daniel

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